

**COMMENTS ON THE PETITION FOR RULE-MAKING RM-10869
PROPOSED BY Ronald D. Lowrance, K4SX**

Submitted by Adriana De Lourdes Garcia

Morse Code Requirement

No clear regulatory purpose is served by privileging a mode of communication over another—i.e., by keeping the Morse code requirement for *any* license class.

§ The effective supply of alternative communication modes available during emergencies is not likely to increase because “learning” a specific mode of operation becomes a regulatory requirement for any license class. No purpose is served by asking people to learn Morse code if many individuals will later forget how to use it—only those who have a legitimate and continuing interest in Morse code as a means of communication will maintain and improve their skills for Morse operations (potentially available at times of emergency). Interested individuals will learn the code of their own volition, with or without regulatory intervention.

§ Otherwise, Morse code *as a requirement* for any license class constitutes an entry barrier that is *obstructing progress* of the radio art and *diminishing the appeal* of amateur radio among public service-oriented and technically-oriented individuals.